

April 29, 2003

James A. Barter, Ph.D
Director, Environmental Health Sciences & Toxicology
PPG Industries, Inc.
One PPG Place
Pittsburgh, Pennsylvania 15272

Dear Dr. Barter:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the revised test plan and robust summaries for Propanoic Acid, 2-hydroxy-, compound with 3-[2-(dimethylamino)ethyl]1-(2-ethylhexyl)(4-methyl-1,3-phenylene)bis[carbamate] (1:1) (CAS No. 68227-46-3) posted on the ChemRTK HPV Challenge Program Web site on February 28, 2003. I commend PPG Industries, Inc. for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA will post this letter and the enclosed comments on the HPV Challenge Web site within the next few days. As noted in the comments, we ask that PPG Industries, Inc. advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission.

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director
Risk Assessment Division

Enclosure

cc: C. Auer
A. Abramson
W. Penberthy
M. E. Weber

**EPA Comments on Chemical RTK HPV Challenge Submission:
2-Hydroxypropanoic acid, compound with 3-[2-(dimethylamino)ethyl]1-(2-ethylhexyl)(4-methyl-1,3-phenylene)bis(carbamate)(1:1) (CAS No. 68227-46-3)**

Summary of EPA Comments

The sponsor, PPG Industries, Inc., submitted a revised test plan and robust summaries for Propanoic Acid, 2-hydroxy-, compound with 3-[2-(dimethylamino)ethyl]1-(2-ethylhexyl)(4-methyl-1,3-phenylene)bis[carbamate] (1:1) (CAS No. 68227-46-3) to EPA on February 13, 2003. EPA posted the submission on the Chemical RTK HPV Challenge Web site on February 28, 2003.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical Properties and Environmental Fate. EPA agrees with the test plan for these endpoints.
2. Health Effects. EPA agrees with the test plan for these endpoints.
3. Ecological Effects. EPA agrees with the test plan for these endpoints, but in addition recommends that a chronic daphnia test be conducted.

EPA requests that the submitter advise the Agency within 60 days of any modifications to its submission.

EPA Comments on the 2-hydroxypropanoic Acid, Compound with 3-[2-(Dimethylamino)ethyl]1-(2-ethylhexyl)(4-methyl-1,3-phenylene)bis[carbamate] (1:1) Challenge Submission

Test Plan

The submitter provided estimates for vapor pressure, partition coefficient, photodegradation, stability in water, and transport/distribution and plans to provide test data for all other SIDS-level endpoints. The submitter needs to revise the relevant estimated endpoints with the water solubility data that will be developed. EPA agrees with the submitter's proposal to use the *in vitro* cytotoxicity test to estimate starting doses for the acute toxicity test.

Ecotoxicity (fish, invertebrates, and algae)

The test plan for these endpoints is adequate for the purposes of the HPV Challenge program. However, in addition, EPA recommends that a chronic daphnia test be performed because the estimated Log Kow is greater than 4.2 and chemicals of this type are known to be acutely and chronically toxic to aquatic organisms. In addition, the chemical is fairly persistent in the aquatic environment due to the amide ester bonds not being readily hydrolyzable.

Specific Comments on the Robust Summaries

None.

Followup Activity

EPA requests that the submitter advise the Agency within 60 days of any modifications to its submission.